

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Crim. No. 04-CR-10299 PBS

ABDALLAH HAMDAN

**MOTION FOR PRE-PLEA PRESENTENCE REPORT**

Now comes the defendant in the above captioned matter, by his attorney, and moves this Honorable Court to order the preparation of a probation “presentence” report prior to his entry of a plea in this matter. As reason therefore, the defendant states that he is unsure as to how the probation department will categorize his sentencing guideline range, based upon the government’s version of the offense, probation’s determination of the drug quantity that he is accountable for, his criminal history category, and probation’s own research. This information will permit counsel to more accurately advise the defendant as to the potential benefits of a plea.

Respectfully Submitted,

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Dated: November 16, 2005